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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,
Debtors.¹**

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**DEBTORS' JOINDER IN, AND STATEMENT WITH RESPECT TO, EX PARTE
MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
PURDUE PHARMA, ET AL. FOR AN ORDER AUTHORIZING EXAMINATIONS
PURSUANT TO FEDERAL RULES OF BANKRUPTCY PROCEDURE 2004 AND 9016**

Purdue Pharma L.P. and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), submit this joinder in, and statement with respect to, the *Ex Parte Motion of the Official Committee of Unsecured Creditors of Purdue Pharma, et al. for an Order Authorizing Examinations Pursuant to Federal*

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Rules of Bankruptcy Procedure 2004 and 9016 submitted by the Official Committee of Unsecured Creditors (the “**Official Committee**”) and respectfully state as follows:

STATEMENT & BACKGROUND

1. Debtors join the Official Committee in its motion to put in place the mechanics needed for obtaining discovery under Rule 2004 from Initial Covered Sackler Persons.

2. In addition to having an interest in obtaining and reviewing documents requested by the Official Committee, Debtors have also sought information and documents from the Initial Covered Sackler Persons. Many of these requests relate to the ongoing work by the Special Committee in connection with its review of transfers between the Debtors and the Sacklers and entities owned or controlled by the Sacklers.

3. The Debtors are hopeful that ongoing discussions with the Initial Covered Sackler Persons, which have been productive, will continue. Indeed, the Debtors are hopeful that the parties can continue to work through and resolve discovery issues informally. In the event that issues do not progress as needed under the informal process, Debtors wish to preserve their ability to serve formal Rule 2004 discovery without delay.

4. Debtors are mindful that overly broad or burdensome discovery risks unnecessary delay and costs and would put at risk the timely resolution of these cases – a goal that is important to all stakeholders, including the American public.

CONCLUSION

For the reasons set forth above and in the Official Committee’s Ex Parte Motion, Debtors respectfully request that the Court enter an order that authorizes both the Official Committee and the Debtors to undertake a Rule 2004 examination of the Initial Covered Sackler Persons. Attached

hereto as Exhibit A, in clean and black line, is a proposed form of order adding the Debtors to the order submitted by the Official Committee.

Dated: March 25, 2020
New York, New York

Respectfully Submitted,

/s/ James I. McClammy

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